

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States of
America, et al.,

Defendants.

NO.

DECLARATION OF A.F.

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ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

1 I, A.F., declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make
3 this declaration based on my personal knowledge.

4 2. I live in Seattle, Washington, with my family. I have been living here for the last
5 15 years and am originally from Yakima, Washington. I am a licensed attorney but not currently
6 practicing. I work at a local winery. My wife is a stay-at-home mom. I am the father of two small
7 children. My oldest is four and half years old, and my youngest is 19 months old. My eldest
8 child, J.F., is transgender. When she was born, she was designated male on her birth certificate,
9 but her gender identity is female.

10 3. I chose to use initials for our names in this declaration because I am fearful for
11 my family's safety and privacy in the current political climate. We fear being targeted by the
12 Federal Government or by individuals who are anti-trans.

13 4. For the last year, J.F. has been consistently telling us that she is a girl, and that
14 she does not feel like a boy. She asked us to wear pink clothes and for us to buy her dresses. J.F.
15 also asked that we use she/her pronouns when referring to her. J.F. has never wavered in her
16 gender identity or in wanting to use she/her pronouns.

17 5. My wife and I asked our therapists for advice on the best way to act given J.F.'s
18 wishes and requests. We both want J.F. to be happy with who she is and to parent her with the
19 guidance of science and people with more knowledge in this area. I'm lucky that my cousin is a
20 trans man and a counselor for LGBTQ youth. He has also guided us on the best ways to approach
21 this challenge as parents. We joined parents' groups for people with trans kids and started
22 participating in this community that is still very new to us.

23 6. Based on their advice and our research and beliefs, we supported J.F.'s wishes
24 and let her wear what she wants. We could see how happy she was when she got to wear the
25 dresses to the playground and at her school. We could tell she was feeling more like herself and
26 acted more content.

1 7. There was an issue with one of her teachers at preschool, who wouldn't address
2 J.F. as a girl even when everyone else was already treating her as one. J.F. felt very anxious
3 whenever she had to be with that teacher and cried every time she saw her. We met with the
4 directors of the preschool, and they were very understanding and accommodating. The teacher
5 with whom J.F. had the issue ended up leaving for an unrelated reason. We haven't had any
6 similar issues since and J.F. has been thriving at school.

7 8. We have learned through our research and conversations with the trans
8 community that transgender children that are not supported in their transition and can't access
9 the gender affirming care frequently experience mental health issues like depression, anxiety,
10 and suicidality. One of my parents died by suicide, so I am acutely aware of that risk. It is one
11 of my biggest fears that J.F. would get to the point of wanting to hurt herself because she is not
12 supported by society or medical providers in her development as a trans person.

13 9. The Executive Order issued by the Federal Government that aims to restrict
14 gender affirming care to transgender minors terrifies us. We have always felt lucky to live in
15 Seattle and the state of Washington, a place where people are generally supportive of the trans
16 community. But this order would affect us regardless, and we live in fear that when the time
17 comes and J.F. needs medical care that supports her gender identity, she will not be able to access
18 it. We also worry that we can't prepare for the type of medical care J.F. may need some day,
19 given the executive order's impact on access to care. Although J.F.'s age shelters her from
20 political rhetoric, I can't imagine what it would do to J.F.'s mental health and well-being to know
21 she lives in a country that does not accept her for who she is.

22 10. If the Executive Order is enforced and the policies do not change in the next years,
23 we would be forced to leave the country and settle in a place where J.F. can access the gender
24 affirming care she needs. This would be a massive hardship for our family, logistically,
25 financially, and emotionally. We have no intention of leaving our community, extended families,
26

1 jobs, and our country. But we would do whatever it takes to ensure J.F. doesn't suffer the same
2 way many other trans kids who were denied gender affirming care did.

3 I declare under penalty of perjury under the laws of the State of Washington and the
4 United States of America that the foregoing is true and correct.

5 DATED this ____ day of February 2025 at _____, Washington.

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8 A.F.
9 Parent of J.F.
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